



***SMUCKER QUALITY BEVERAGES, INC.***

August 10, 2005

Arthur Neal  
Director, Program Administration  
National Organic Program  
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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07.

**Smucker Quality Beverage** supports the continued allowance of the following substance(s):

Name of Substance	Location on National List	Reason for continued allowance.	Supporting Documents (example: research data or other international organic programs)
Acids (Alginic, Citric)	205.605 (a)	Use as pH Adjustor	➤ International Organic Regulations: Australia, Canada, Codex, EU, Japan
Carageenan	205.605 (a)	Thickener in juices	➤ International Organic Regulations: Australia, Canada, Codex, EU, Japan ➤ 21 CFR 172.620, 182.7255
Flavors	205.605 (a)	In the early 1980's our company worked with a flavor house to develop the first certified organic lemon and organic orange flavors. Since then our product development department is continuously working with the flavor industry to convert the natural flavors in our beverages to organic. Unfortunately, not all organic flavors are commercially available.	21 CFR 182.1 GRAS
Lactic acid	205.605 (a)	Use as a pH adjustor	

Nitrogen	205.605 (a)	Nitrogen is essential for keeping the packaging on canned juice products firm. No alternatives available.	<ul style="list-style-type: none"> <li>➤ International Organic Regulations: Canada, Japan</li> <li>➤ 21 CFR 184.1540</li> </ul>
Tartaric Acid	205.605 (a)	Use as a pH adjuster	<ul style="list-style-type: none"> <li>➤ 21 CFR 184.1099</li> <li>➤ NOSB 11/95</li> </ul>
Alginates	205.605(b)	SQB uses (Na) alginates in one of our products. Other gum alternatives tried but did not work. Product separated.	<ul style="list-style-type: none"> <li>➤ 21 CFR 184.1724 GRAS</li> </ul>
Ascorbic Acid	205.605(b)	Ascorbic acid is essential for keeping fruits from oxidizing during the manufacturing process. Although ascorbic could be made from natural forms it is not currently commercially available. Use as a source of Vit. C	<ul style="list-style-type: none"> <li>➤ 182.8013 GRAS as Nutrient</li> <li>➤ 21 CFR 145.110, 145.115, 145.135, 145.170 – in canned fruits.</li> <li>➤ 21 CFR 146.185 and 146.187 – in canned fruit juices.</li> <li>➤ NOSB 04/95</li> </ul>
Calcium hydroxide	205.605(b)	Use as a processing aid during manufacturing of sugar. Essential for sweetening fruit juice beverages.	<ul style="list-style-type: none"> <li>➤ NOSB 04/95</li> <li>➤ 21 CFR 178.1010</li> </ul>
Carbon Dioxide	205.605(b)	Essential for carbonating beverages. No commercially available alternatives.	<ul style="list-style-type: none"> <li>➤ 21 CFR 165.110 – in bottled water</li> <li>➤ 184.1240 GRAS</li> <li>➤ 11/01/95 – NOSB voted to allow synthetic and non-synthetic. Only synthetic on National List.</li> </ul>
Chlorine materials	205.605(b)	GMP's – cleaning agent.	<ul style="list-style-type: none"> <li>➤ 40 CFR 141.72 Disinfection requirements.</li> <li>➤ NOSB 11/95</li> </ul>
Ethylene	205.605(b)	Suppliers of raw materials use Ethylene for ripening fruit.	<ul style="list-style-type: none"> <li>➤ NOSB - 11/95 – Banana's</li> <li>➤ NOSB - 11/99 – citrus &amp; tropical fruit</li> </ul>
Glycerin	205.605(b)	Suppliers of Organic/Natural Flavors use Glycerin in manufacturing.	<ul style="list-style-type: none"> <li>➤ 21 CFR 182.1320 – GRAS-</li> <li>➤ 21 CFR 169.175 – in vanilla extract</li> <li>➤ NOSB 04/95</li> </ul>
Hydrogen Peroxide	205.605(b)	Essential for use in disinfecting aseptic packaging. No commercially available alternatives.	<ul style="list-style-type: none"> <li>➤ 21 CFR 184. 1366 – GRAS</li> <li>➤ 21 CFR 173.315 – washing of fruit &amp; vegetables. Sanitizer</li> <li>➤ International Organic Regulations: Canada</li> <li>➤ NOSB 11/95</li> </ul>
Nutrient vitamins and minerals	205.605(b)	Fortification of beverages when allowed under CFR 104.20. Natural sources not commercially available.	<ul style="list-style-type: none"> <li>➤ CFR 104.20.</li> <li>➤ International Organic Regulations: Australia</li> <li>➤ NOSB 11/95</li> </ul>
Ozone	205.605(b)	Use as a disinfectant on processing equipment. Much more desirable than other sanitizing chemicals.	<ul style="list-style-type: none"> <li>➤ 21 CFR 173.368 – allowed for contact with food</li> <li>➤ 21 CFR 184.1563 – GRAS</li> <li>➤ NOSB 11/95</li> </ul>
Pectin (low methoxy)	205.605(b)	Stabilizer in Jams & Jellies. Although other alternatives available they do not meet the	<ul style="list-style-type: none"> <li>➤ 21 CFR 84.1588 – GRAS</li> <li>➤ 21 CFR 145.116, 126, 131, 136, 171, 181 – canned fruits</li> </ul>

		same quality standards.	<ul style="list-style-type: none"> <li>➤ 21 CFR 150, 110, 140, 141, 160 and 161 – in fruit butters, jellies, preserves and related products.</li> <li>➤ International Organic Regulations: Australia, Canada, Codex, EU, Japan</li> <li>➤ NOSB 04/95</li> </ul>
Tartaric Acid	205.605(b)	Use as pH adjuster.	➤ NOSB 11/95
Xanthan Gum	205.605(b)	Although other gums available they do not stabilize our Organic Chocolate Syrup. No known alternatives.	<ul style="list-style-type: none"> <li>➤ 21 CFR 133</li> <li>➤ International Organic Regulations: Canada, Australia, Codex, EU</li> <li>➤ NOSB 04/95</li> </ul>
Gums(water extracted only) arabic, guar, locust bean, carob bean	205.606	Used as a thickening agent in juices.	➤ International Organic Regulations: Australia, Canada, Codex, EU, Japan
Pectin (high-methoxy)	205.606	Stabilizer in Jams & Jellies.	➤ International Organic Regulations: Australia, Canada, Codex, EU, Japan

Sincerely,

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Cc: Organic Trade Association  
National Organic Standards Board  
Grocery Manufacturers Association